

DANA A. SUNTAG (State Bar #125127)  
JOSHUA J. STEVENS (State Bar #238105)  
HERUM\CRABTREE\SUNTAG  
*A California Professional Corporation*  
5757 Pacific Avenue, Suite 222  
Stockton, California 95207  
Telephone: (209) 472-7700  
[dsuntag@herumcrabtree.com](mailto:dsuntag@herumcrabtree.com)  
[jstevens@herumcrabtree.com](mailto:jstevens@herumcrabtree.com)

Attorneys for All Defendants

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

ESTATE OF SAOUN POL and J.P.,  
Plaintiffs,  
vs.  
CITY OF STOCKTON,  
Defendants.

Case No.: 2:21-cv-00788-WBS-AC

**STIPULATION TO STAY CASE FOR  
60 DAYS; ORDER**

**[No hearing required]**

1 This Stipulation is respectfully submitted by all named parties: Plaintiffs Estate of  
2 Saoun Pol, by and through real party in interest J.P. (both in his representative capacity,  
3 as successor in interest on behalf of the estate, and in his individual capacity, on his  
4 own behalf), on the one hand; and Defendants City of Stockton (also named as  
5 "Stockton Police Department") (the "City"), Chief of Police Eric Jones, Officer Jorge  
6 Andrade, and Officer Bradley Miller, on the other hand; all through their undersigned  
7 counsel of record.

8 RECITALS

9 A. On May 3, 2021, Plaintiffs filed this lawsuit. In their Complaint, Plaintiffs  
10 allege the City and its officers used excessive force on Saoun Pol, resulting in his death.  
11 Plaintiffs are the estate of the decedent (represented by the son of the decedent) and  
12 the son of the decedent.

13 B. On or about May 5, 2021, Plaintiffs served process on the City and  
14 Officers Andrade and Miller.

15 C. On May 25, 2021, the parties filed a stipulation granting the City and  
16 Officers Andrade and Miller a 28-day extension of time (through and including June 23,  
17 2021), and deeming Chief Jones to have been served with process so that Plaintiffs  
18 need not serve him. (Doc. No. 7).

19 D. On multiple dates in June 2021, Defendants' counsel provided informal  
20 discovery and early disclosures to Plaintiffs' counsel. The information Defendants'  
21 counsel provided included both Officers' body camera footage of the incident and  
22 incident reports containing eyewitness accounts of the decedent's actions leading up to  
23 the use of force. In the course of these disclosures, counsel also engaged in settlement  
24 discussions.

25 E. On June 22, 2021, the parties filed a stipulation and proposed order for a  
26 second extension of time, noting they continued to engage in settlement discussions.  
27 The stipulation and proposed order requested an additional 21 days to respond to the  
28 Complaint (through July 14, 2021). (Doc. No. 8). On June 25, 2021, the Court so

1 ordered the stipulation. (Doc. No. 9).

2 F. Plaintiffs initially were represented by two sets of counsel, the Law Office  
3 of Mark E. Merin and the Law Office of Yolanda Huang. On July 8, 2021, the Law Office  
4 of Mark E. Merin withdrew from the case. (Doc. Nos. 10 and 11).

5 G. Plaintiffs' remaining counsel and counsel for the Defendants continue to  
6 discuss a possible resolution of the case. Plaintiffs' counsel represents that, because of  
7 the emotional nature of the situation at issue, Plaintiffs need additional time to consider  
8 a possible resolution.

9 H. On July 9, 2021, counsel telephonically met and conferred, and agreed to  
10 request the Court to stay the case for 60 days to allow Plaintiffs additional time to  
11 process the information they received from defense counsel and determine the future of  
12 this case and a possible resolution.

13 STIPULATION

14 IT IS STIPULATED AND AGREED, by all the parties, through their counsel of  
15 record, that this case be stayed for 60 days from July 12, 2021, through and including  
16 September 10, 2021.

17 IT IS FURTHER STIPULATED AND AGREED that, if the parties have not filed a  
18 dismissal of the entire case by September 10, 2021, Defendants shall have 14 days  
19 from that date (through and including September 24, 2021), to move, plead, or  
20 otherwise respond to the Complaint.

21  
22  
23 *[signatures appear on the next page]*  
24  
25  
26  
27  
28

1 Dated: July 12, 2021

HERUM CRABTREE SUNTAG  
*A California Professional Corporation*

2  
3 By: /s/ Dana A. Suntag  
4 DANA A. SUNTAG  
5 Attorneys for all Defendants

6 Dated: July 12, 2021

LAW OFFICE OF YOLANDA HUANG  
7  
8 By: /s/ Yolanda Huang  
9 YOLANDA HUANG  
10 Attorneys for all Plaintiffs

11 ORDER


12 IT IS SO ORDERED:

13 1. This case is stayed for 60 days from July 12, 2021, through and including  
14 September 10, 2021;

15 2. If the parties have not filed a dismissal of the entire case by September 10,  
16 2021, Defendants shall have 14 days from that date (through and including September  
17 24, 2021), to move, plead, or otherwise respond to the Complaint; and

18 3. The Scheduling Conference is continued to **November 22, 2021 at 1:30 p.m.**  
19 A joint status report shall be filed no later than **November 8, 2021** in accordance with  
20 the Court's order issued May 3, 2021 (Docket No. 4).

21 Dated: July 13, 2021

  
22 WILLIAM B. SHUBB  
23 UNITED STATES DISTRICT JUDGE  
24  
25  
26  
27  
28